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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

Julie Su,  
Acting Secretary of Labor,  
United States Department of Labor,

Plaintiff,

v.

Imperial Pacific International Holdings, Ltd.,  
Imperial Pacific International (CNMI), LLC

Defendants.

) Case No. CV 19-00007

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**NOTICE OF AUTHORIZATION OF  
RECEIVER TO EXERCISE ALL  
POWERS UNDER THE ORDER  
APPOINTING RECEIVER AND  
SETTING TERMS OF RECEIVERSHIP  
TO SELL LOT 463 PARCELS**

Plaintiff, Julie Su, Acting Secretary of Labor, United States Department of Labor (the “Acting Secretary”), hereby gives notice that Defendants Imperial Pacific International Holdings, Ltd, Imperial Pacific International (CNMI), LLC, (collectively IPI) have failed to cure default within ten (10) business days of the filing of the Secretary’s Notice of Failure to Cure Default [ECF 93] and the Receiver is authorized and will proceed to exercise all powers under the Order Appointing Receiver and Setting Terms of Receivership [ECF 50], to sell the "Lot 463 Parcels" identified in Exhibit A of the Second Amended Judgment [ECF 91], to pay the full gross

**NOTICE OF AUTHORIZATION OF RECEIVER**

1 amount outstanding (**\$797,719.73**) plus the Receiver's costs and fees.

2 Under the terms of this Court's Judgment [ECF 2, ECF 60, and ECF 91], IPI's failure to  
 3 make timely payments beginning on August 1, 2023, constituted an event of default. Pursuant to  
 4 these terms, the Secretary filed a Notice of Default [ECF 92] on September 4, 2023, and served it  
 5 on Defendants. As a result of IPI's default, the full gross amount outstanding and due under this  
 6 Consent Judgment as amended became immediately due to the U.S. Department of Labor.  
 7 Although Defendants were making periodic payments, they never cured the default and filed a  
 8 Chapter 11 bankruptcy petition, # 1:24-bk-00002, on April 19, 2024. On July 24, 2024, the  
 9 Court granted the parties' stipulation to vacate the automatic stay with respect to IPI in  
 10 connection with the instant matter. *See* Dkt. 176, # 1:24-bk-00002. On August 31, 2024, the  
 11 Secretary filed a Notice of Failure to Cure Default [ECF 93] and served it on Defendants. As  
 12 Defendants have failed to cure default within ten (10) business days of the filing of the  
 13 Secretary's Notice of Failure to Cure Default, the Receiver is authorized and will proceed to  
 14 exercise all powers under the Order Appointing Receiver and Setting Terms of Receivership  
 15 [ECF 50], to sell the "Lot 463 Parcels" identified in Exhibit A of the Second Amended Judgment  
 16 [ECF 91], to pay the full gross amount outstanding (**\$797,719.73**) plus the Receiver's costs and  
 17 fees.

18 SEEMA NANDA  
 Solicitor of Labor

19 MARC PILOTIN  
 Regional Solicitor

21 Boris Orlov  
 Wage & Hour Counsel

22 /s/Charles Song

10/22/24

23 CHARLES SONG, Senior Trial Attorney  
 Attorneys for the Plaintiff  
 U.S. Department of Labor

Date

25 **NOTICE OF AUTHORIZATION OF RECEIVER**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an employee in the Office of the Solicitor, U.S. Department of Labor, at Los Angeles, California, and is a person of such age and discretion as to be competent to serve papers.

That on October 22, 2024, he caused a copy of the Secretary's NOTICE OF AUTHORIZATION OF RECEIVER TO EXERCISE ALL POWERS UNDER THE ORDER APPOINTING RECEIVER AND SETTING TERMS OF RECEIVERSHIP TO SELL LOT 463 PARCELS and this Certificate of Service to be served on Defendants by emailing to the addresses stated below:

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/s/Charles Song  
Charles Song  
**U.S. DEPARTMENT OF LABOR**

**NOTICE OF AUTHORIZATION OF RECEIVER**